

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

FULLERTON CAPITAL PTE LTD.,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01004 (CGM)

**STIPULATION AND AGREED ORDER EXTENDING
TIME FOR INITIAL DISCLOSURES**

WHEREAS, Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (the “Trustee”) has brought Adversary Proceeding No. 12-01004 (CGM) (the “Action”) against defendant Fullerton Capital Pte. Ltd. (the “Defendant”) (collectively with the Trustee, the “Parties”).

WHEREAS, on April 17, 2023, the Court entered a Case Management Plan in the Action (Dkt. No. 126) (the “CMP”).

WHEREAS, pursuant to the CMP, initial disclosures required under Federal Rule of Civil Procedure 26(a)(1)(A) were to be served on or before 60 days after the date of entry of the CMP, which fell on June 16, 2023 (the “Initial Disclosure Deadline”).

WHEREAS, the Parties and their counsel have been working diligently but have determined that circumstances beyond their control require an extension of the Initial Disclosure Deadline.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the Parties, through their undersigned counsel, that:

1. The Initial Disclosure Deadline is extended up to and including July 7, 2023.
2. All other provisions of the CMP are unaffected by this order.

[Signatures on following page]

Dated: June 12, 2022
New York, New York

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Robyn M. Feldstein
Email: rfeldstein@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard,
Trustee for the Liquidation of Bernard L.
Madoff Investment Securities LLC and the
Chapter 7 Estate of Bernard L. Madoff*

ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Kent A. Yalowitz
250 West 55th Street
New York, New York 10019
Telephone: 212.836.8000
Facsimile: 212.836.8689
Kent A. Yalowitz
Email: kent.yalowitz@arnoldporter.com

- and -

Daniel R. Bernstein

ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Avenue, NW
Washington, D.C. 20001
Telephone: (202) 942-6678
Facsimile: (202) 942-5999
Email: daniel.bernstein@arnoldporter.com

Attorneys for Defendant Fullerton Capital PTE Ltd.

SO ORDERED.

Dated: June 13, 2023
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
U.S. Bankruptcy Judge